

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known as  
THE ROYAL BANK OF SCOTLAND, N.V.),

Defendant.

Adv. Pro. No. 10-05354 (SMB)

**[PROPOSED] ORDER GRANTING MOTION OF ABN AMRO BANK  
N.V. (presently known as THE ROYAL BANK OF SCOTLAND, N.V.)  
FOR THE ENTRY OF AN ORDER PURSUANT TO FEDERAL RULE  
OF BANKRUPTCY PROCEDURE 8002(d) FOR AN EXTENSION OF  
TIME TO FILE A NOTICE OF APPEAL AND  
MOTION FOR LEAVE TO APPEAL**

On November 22, 2016, this Court entered the Memorandum Decision Regarding Claims to Recovery Foreign Subsequent Transfers (the “Memorandum Decision”), denying Defendant ABN AMRO Bank N.V.’s (presently known as The Royal Bank Of Scotland, N.V.) (“RBS/ABN”) Extraterritorial Motion to Dismiss the claims of Irving H. Picard (the “Trustee”)

against RBS/ABN. *See Securities Investor Protection Corp. v. Bernard L. Madoff Investment Secs. LLC (In re Madoff)*, No. 08-01789 (SMB), ECF No. 14495.

On March 3, 2017, this Court entered the Stipulated Order Denying Motion to Dismiss Complaint (the “Order”). *Picard v. ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.)*, Adv. Pro. No. 10-05354 (SMB), ECF No. 117.

On March 14, 2017, RBS/ABN filed a Notice of Motion of ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland, N.V.) for the Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 8002(d) for an Extension of Time to File a Notice of Appeal and Motion for Leave to Appeal (the “Motion”) and a proposed order annexed thereto.

Upon RBS/ABN’s Motion; and adequate notice of the Motion and the opportunity for a hearing having been provided; and no objections to the Motion having been filed; and no additional notice of or a hearing on the Motion being required under the circumstances; and after due deliberation and sufficient cause appearing therefor, the Court being satisfied that the Motion sets forth a valid and proper basis for the relief granted herein, it is hereby:

**ORDERED**, that pursuant to Federal Rule of Bankruptcy Procedure 8002(d), the time to file a notice of appeal and motion for leave to appeal from the Order shall be extended to the later of: (i) April 7, 2017 (twenty-one days after March 17, 2017, the time prescribed by the Federal Rules of Bankruptcy Procedure); or (ii) fourteen days after the date of entry of this Order; and it is further

**ORDERED**, that this Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: March \_\_, 2017  
New York, New York

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE